

Appl. No. 10/689,380  
Amdt. dated 1 November 2006  
Reply to Office action of 31 August 2006

**Amendments to the Drawings:**

Submitted herewith is one sheet of replacement drawings.

Attachments: Replacement sheets 7/7

Annotated sheet 7 showing changes.

### **REMARKS/ARGUMENTS**

Entry of this Amendment is respectfully requested on the grounds that it reduces the issues for any subsequent appeal. The following remarks concerning the drawings could not have been entered earlier because the remarks respond to objections raised for the first time in the final Office action.

In paragraph 5 of the Office action, the drawings are objected to under 37 CFR 1.83(a) for allegedly failing to show every feature of the invention specified in the claims. A corrected drawing sheet, sheet 7 carrying Fig. 15, is enclosed herewith which addresses each of the examiner's concerns as follows:

- generating and [*sic*] the initial count is represented by box 120;
- the current count is represented by box 130;
- the target count comparisons are represented by the decision step 135;
- incrementing/decrementing the current count is represented by box 130;
- shifting data in the positive and negative z direction is represented by box 110; and
- shifting data diagonally is represented by box 110.

It is respectfully submitted that various details which the examiner is questioning, such as generating an initial count, the current count, etc. are trivial implementation details, well within the skill of a person of ordinary skill in the art. The issue seems to be whether such details are shown in the drawing, as opposed to whether they are disclosed in the specification.

The single concern the examiner raised with respect to the introduction of new matter relates to the alleged introduction of new matter by providing "further detail as to when exactly the counter is decremented with regard to the question 'data loaded.'" The question box "data loaded" has been moved so that it now appears between decision box 135 and box 140. Thus, the decrementing of the counter is directly responsive to the shifting of data. That should alleviate the examiner's concern that new matter is being introduced regarding the decrementing of the counter. Support for the decision box "data loaded to output matrix" is found in paragraph 13 which provides "each processing element can conditionally load any of the values it sees into the output result matrix. However, only one value (the desired result) is loaded into the output matrix." The specification clearly provides that only one of the output data is loaded

to the output matrix. The unnumbered decision block implements the disclosure in the specification.

It is respectfully submitted that replacement sheet 7 of 7 carrying Fig. 15 clearly illustrates all of the features found in the claims without introducing any new matter.

In paragraph 7 of the Office action, claim 1 is objected to for the following reason.

In line 5 “the processing element” lacks clear antecedent basis. Note that certain processing elements with different limitations are mentioned within claim 1. It appears that “the processing element” is referring to one of the “at least of said processing elements maintaining a count;” however this link is not clear within the wording.

It is respectfully submitted that the examiner is apparently overlooking the phrase which precedes the phrase “storing data in the processing element.” The immediately preceding phrase states “for each processing element maintaining a count.” It is thus clear from the plain language of the claim that the processing element that is storing data is the processing element that is maintaining a count. However, to make it abundantly clear, claim 1 has been amended to recite “selecting data, in each processing element maintaining a count, for output in response to that processing element’s count.”

The primary reference in this case is U.S. Patent No. 4,992,933 to Taylor. Claim 1 recites a plurality of processing elements. At least certain of those processing elements maintain a count. That count is responsive to the processing element’s location. Data is selected in each of the processing elements which is maintaining a count for output in response to that processing element’s count. Each of the other independent claims has similar language.

Even assuming the examiner’s assertion that the array controller 14 of Tyler constitutes a processing element, where in Tyler is there a plurality of processing elements each maintaining a count? Where, in Tyler, is there a disclosure of selecting data in each of the processing elements maintaining a count for output in response to that processing element’s count? Tyler is a distinctly different architecture as can be seen by comparing the figures of Tyler to the figures of the present application. It is not surprising that a completely different architecture operates in a completely different way. The 35 U.S.C. rejection claims 1-2, 5-11, 15-16, and 19-26 should be withdrawn.

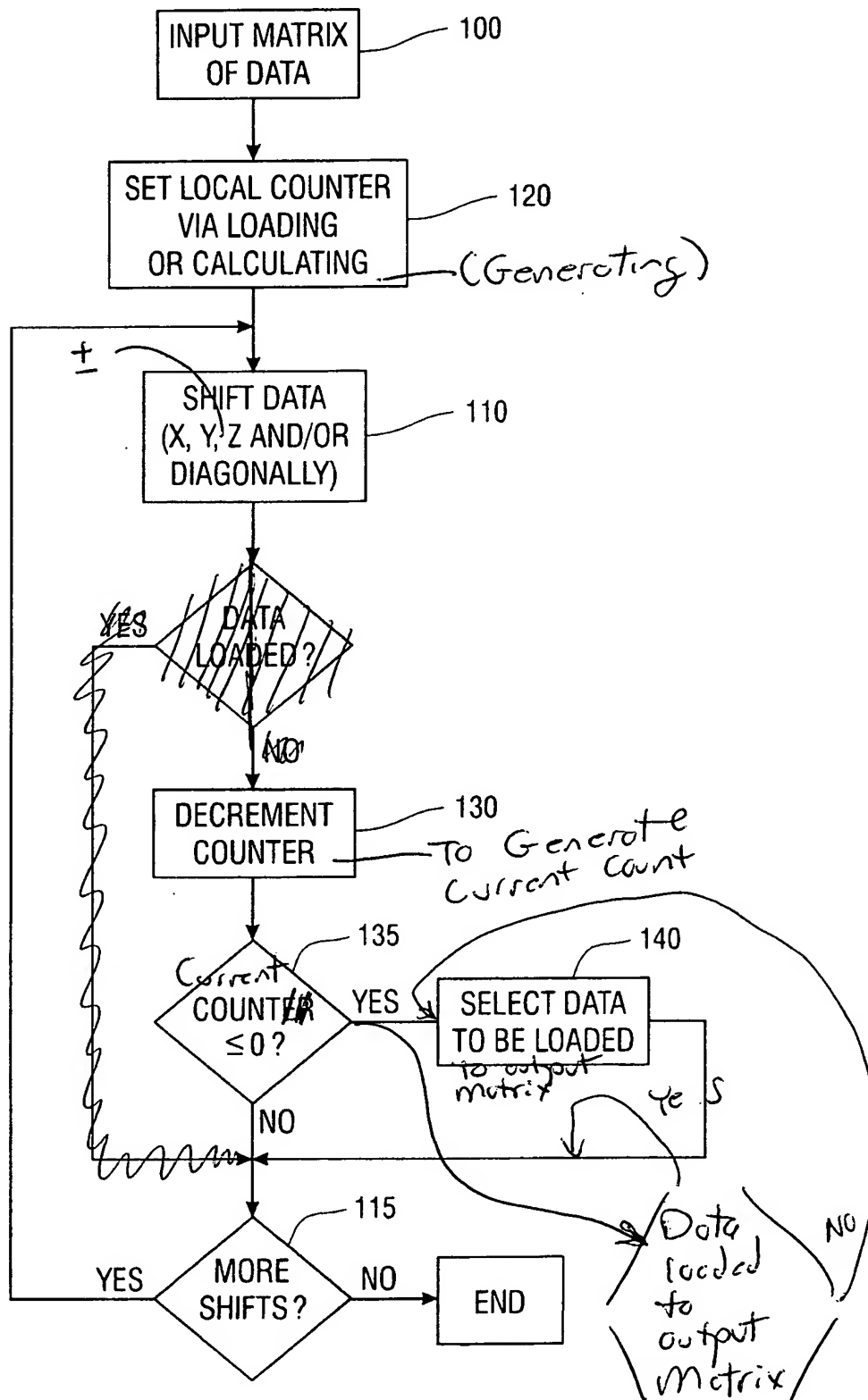
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Applicant has made a diligent effort to place the instant application in condition for allowance. Accordingly, a notice of allowance for claims 1-26 is respectfully requested. If the examiner is of the opinion that the instant application is in condition for disposition other than through allowance, the examiner is respectfully requested to contact applicant's attorney at the telephone number listed below.

Respectfully submitted,



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**Fig.15**